

EXHIBIT 113

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

1 Pursuant to 28 U.S.C. § 1746(2), I, Emily Schuh hereby declare as follows:

- 2 1. I am over the age of eighteen and competent to testify herein.
- 3 2. I am employed at the City of Anacortes. My job title is Director of Administrative Services.
- 4 My job is to oversee the City's Administrative Services Department, which provides
- 5 oversight and management of human resources, risk management, municipal court services,
- 6 public defense services, Anacortes Senior Activity Center, and municipal fiber.
- 7 3. There is at least one employee at the City of Anacortes who is a recipient of Deferred Action
- 8 for Childhood Arrivals (DACA).
- 9 4. The City DACA recipient is a trusted employee whose job duties are essential to City
- 10 operations. This individual works in a small department whose operations would be
- 11 severely impacted by the loss of an employee.
- 12 5. The City of Anacortes spends time and resources to recruit, hire, train, and supervise
- 13 employees. When any employee departs, it creates disruption for our agency and costs us
- 14 time and resources to replace and train that person.
- 15 6. The termination of DACA will be disruptive to operations and cause us to expend additional
- 16 resources.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed on this 27th day of September, 2017

19 EC Schuh SPHR

20 Emily C Schuh

21 [Printed Name]